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JUN 27 1991

Mr. Charles Fillinger
Environmental Coordinator
Armco, Inc.
7000 Roberts
Kansas City, Missouri 64129

Re: Armco, Inc.
EPA ID No: MOD007118029

Dear Mr. Fillinger:

This letter is to confirm the Environmental Protection Agency's (EPA's) position to your inquiry on the removal of an EPA identified Solid Waste Management Unit (SWMU) at the Armco facility.

EPA is currently conducting a RCRA Facility Assessment (RFA) at Armco, and it is our understanding that Armco is considering removing the existing Blooming Mill Scale Pit - a SWMU. The pit is a steel and concrete below-ground storage tank and contains recirculated cooling water from the mill water system, mill scale, and oil and grease. EPA has identified this pit as a SWMU. Armco inquired if EPA approval is needed to remove the pit and if EPA has any clean-up levels for the clean-up/removal of any contaminated media.

In response to your inquiry, Armco does not need EPA approval to remove the Blooming Mill Scale Pit. EPA, at this time, will not provide any specific clean-up levels since a full investigation of the SWMU has not been completed; and EPA will not conduct any oversight activities for any site investigation or remedial activities Armco conducts when removing this pit.

EPA generally recommends clean-up levels meet the most stringent health-based or environmental levels such as Maximum Contaminant Levels (MCLs) and/or background levels. EPA suggests Armco refer to the EPA document "RCRA Facility Investigation Guidance", dated May 1989 (EPA 530/SW-89-031) and the proposed Subpart S regulations which appeared in the July 27, 1990, Federal Register for other general EPA clean-up guidelines.

Armco should document all removal and clean-up activities and samples may be taken to document the surrounding conditions. Armco should also justify and document any clean-up levels which may be less stringent than EPA guidance.

WSTM:RCRA:PRMT:KBELLO:LH:X7658:6-25-91 FILE G:ARMC01

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HARRINGTON

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RCRA RECORDS CENTER

After conducting further investigations and reviewing Armco's records for removing the Blooming Mill Scale Pit, EPA may require, under a permit or corrective action order, remedial implementation actions if EPA deems such actions are necessary to protect human health and the environment.

Because the Blooming Mill Scale Pit handles oil and grease, Armco should consider contacting the Missouri Department of Natural Resources (MDNR) regarding state requirements for clean up and disposal of oil and grease contaminated water and/or soil.

If you have any further questions, please contact Katherine Bello of my staff, at (913) 551-7450. Mr. Frank Dolan with the Missouri Department of Natural Resources (MDNR) at (314) 751-3176, should be contacted regarding the specific state requirements on oil and grease.

Sincerely yours,

Lyndell L. Harrington, P.E.
Chief, Permits Section
RCRA Branch
Waste Management Division

cc: Frank Dolan, MDNR



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

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